August 31, 2001

Ms. Alice Kang Reports Analyst Reports Analysis Division Federal Election Commission 999 E Street, N.W. Washington, DC 20463

> Re: Southern California Fund FEC ID No. C00361419

Dear Ms. Kang:

This is in response to your letters dated July 18, 2001 concerning the 12 Day Pre-General (10/1/2000-10/18/2000), 30 Day Post-General (10/19/2000-11/27/2000) and Amended 30 Day Post-General (10/19/2000-11/27/2000) dated1/31/01 Reports of the above referenced Committee.

You have asked in two of your letters about administrative expenses. The Southern California Fund (the "Committee") is a small committee that has few administrative expenses. Currently, it has no paid staff or rented office space and relies primarily on its fundraising and PAC management consulting firm, Fraioli/Siggins, and volunteers to administer the Committee's activities. All of the expenses incurred to operate the Committee, including payments to its consultants, have been reported as federal operating expenditures on the Committee's FEC reports.

You have also asked about a contribution the Committee made to Kelly for Congress. This contribution was designated on its face to 2000 Primary Election Debt Retirement. The Committee will amend its report under separate cover to clarify this designation for the public record.